

Comment Letter PVWMA



PAJARO VALLEY WATER MANAGEMENT AGENCY

36 BRENNAN STREET • WATSONVILLE, CA 95076
TEL: (831) 722-9292 • FAX: (831) 722-3139
email: info@pvwma.dst.ca.us • www.pvwma.dst.ca.us

L. Snow
Johns
Kathryn Kelly
PVWMA

JAN 09 2006

043

December 19, 2005

Lester Snow, Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: **South Delta Improvements Program**

Dear Director Snow:

On behalf of Pajaro Valley Water Management Agency, I am writing to express our support for the Department of Water Resources' (DWR) South Delta Improvements Program (SDIP). We view this program as a critical water supply, water quality and environmental project designed to meet California's diverse water needs

The Pajaro Valley Water Management Agency (PVWMA) was established in 1984 as a special district responsible for the effective and efficient management of water resources for agricultural, municipal, industrial and other uses within the Pajaro Valley Basin, which spans portions of three California counties: Monterey, Santa Cruz and San Benito.

The Agency's mission is "to efficiently and economically manage existing and supplemental water supplies in order to prevent further increase in, and to accomplish continuing reduction of, long-term overdraft and to provide and insure sufficient water supplies for present and anticipated needs within the boundaries of the Agency. It is anticipated that long-term overdraft problems may not be solved unless supplemental water supplies are provided." The PVWMA has a CVP entitlement of 19,900 acre-feet per year, therefore is very concerned about the reliability of the Delta's water delivery system.

As you know, California is facing a critical challenge: We need a safe, reliable and high quality water supply to keep up with our rapidly rising population and fast-growing trillion-dollar economy. However, with tight water supplies in our arid state, we must better utilize our existing water resources and infrastructure; or put our communities, farms, environment and businesses at great risk. Given its importance the San Francisco Bay/Sacramento-San

PVWMA-1

Lester Snow, Director

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December 19, 2005

JAN 09 2006

043

Joaquin Delta, we need better ways to manage the Delta's water delivery system, as well as the water itself. We need to make every drop count.

In 2000, the state and federal governments initiated the historic CalFed Bay-Delta Program to manage the Bay-Delta's water resources and eco-system. A unique collaboration of interests supported the plan including environmental organizations, water agencies, business interests, farmers, and state and federal water and fish agencies. SDIP is the next step forward in this long-term planning effort for the Bay-Delta.

SDIP is a responsible and balanced plan to better utilize and integrate our existing water management infrastructure in the Delta. Collectively, it will improve our state's water supply reliability, water quality and the overall health of the Bay-Delta ecosystem. The program will construct seasonal tidal gates to protect fish, and improve water circulation and quality in the Delta, dredge select Delta channels to improve water deliveries for local farmers, and allow State Water Project deliveries to increase modestly – only when needed and environmentally safe to do so.

Currently, the state is constrained in its ability to use surplus water supplies. We have the infrastructure to move the water, but until SDIP is approved, the state's water managers cannot fully or responsibly use the existing system. SDIP calls for only a 3-5% increase in the average amount of water pumped from the Delta. More significantly, SDIP will provide the flexibility to shift the timing of water deliveries when surplus is available and when environmentally safe to do so. SDIP is an ideal option for California to advance – it will not require building a new project or the construction of major new infrastructure. And, funding for the program has already been secured through passage of voter approved bonds in 2000 (Proposition 13).

PVWMA-1

Importantly, SDIP will help protect important Delta environmental resources. Specifically, it will help protect fish species in the Delta channels. At the same time, by providing the state greater flexibility in how and when SDIP operates its system of pumps, fish are granted greater protections.

Given all these points, SDIP is supported by a statewide, broad coalition of water, agriculture, business, planning organizations, and local government officials including the Association of California Water Agencies, State Water Contractors, California Chamber of Commerce, California Business Properties Association and the Western Growers Association.

Water is the lifeblood of California – critical to our families, farms, and businesses. It is our responsibility to use this precious resource wisely through all possible best management practices, including water conservation, recycling and storage, to ensure California's water future. It is imperative that we have a more flexible water delivery system so that we can continue to accommodate growth in our population and economy while relying on existing water supplies.

Lester Snow, Director

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December 19, 2005

JAN 09 2006 043

Again, we strongly support SDIP and encourage all key stakeholders to help advance this critically needed project.

PVWMA-1

Sincerely,


Mary Bannister
Interim General Manager

cc:

Hon. Governor Arnold Schwarzenegger

Mr. Ryan Broderrick, Director, California Department of Fish and Game

Mr. Mike Chrisman, Secretary, California Resources Agency

Mr. Joe Grindstaff, Director, California Bay-Delta Authority

Mr. Kirk Rodgers, Regional Director, Mid-Pacific Region, U.S. Bureau of Reclamation

Mr. Dan Skopec, Deputy Cabinet Secretary, Office of the Governor

Mr. Terry Tamminen, Cabinet Secretary, Office of the Governor

Responses to Comments

PVWMA-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter RGWD

Feb. 7. 2006 12:35PM Kern Tulare/Rag Gulch Water dist No.043 P. 1

RGWD

RAG GULCH Water District FEB 07 2006

BOARD OF DIRECTORS
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00157

February 7, 2006

Sharon McHale
United States Bureau of Reclamation
Division of Planning
Via Fax: (916) 978-5094

Paul Marshall
State of California
Department of Water Resources
Via Fax: (916) 653-6077

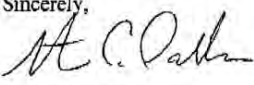
Subject: South Delta Improvements Program

Dear Ms. McHale and Mr. Marshall:

Rag Gulch Water District has reviewed the draft EIS/EIR for the South Delta Improvements Program and finds it to provide an adequate evaluation of environmental impacts. We consider the Program to be beneficial and important in effectively managing water supplies in the delta.

We recognize that DWR has worked hard to develop this EIS/EIR for the South Delta Improvements Program and respectfully urge DWR to certify the EIS/EIR and move forward to implement the Program.

RGWD-1

Sincerely,

Steven C. Dalke
General Manager

DISTRICT OFFICE 5001 California Avenue, Suite 202 Bakersfield, CA 93309 Phone (661) 327-3132 Fax (661) 327-2724
OPERATIONS Route 2, Box 183 Delano, CA 93215 Phone (661) 725-0126 Fax (661) 725-8805

Responses to Comments

RGWD-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter SDCWA

Page 1 of 1

SDCWA

Headrick, Wanda

From: Stadler, Mark [MStadler@sdcwa.org]
Sent: Monday, January 23, 2006 3:20 PM
To: sdip_comments
Subject: deir comment letter
Attachments: sdip draft eir letter.doc

JAN 23 2006 00066

Attached is the San Diego County Water Authority's comment letter on the South Delta Improvement Program DEIR. We also are mailing a hard copy of it today to Lester Snow. Please contact me if you have any questions.

Thanks,
Mark Stadler
Principal Water Resources Specialist
San Diego County Water Authority

1/25/2006



JAN 23 2006 00066

January 23, 2006

Mr. Lester A. Snow
Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: South Delta Improvements Program draft EIR/EIS

Dear Lester:

I am writing on behalf of the San Diego County Water Authority in support of the South Delta Improvements Program (SDIP), which represents a responsible, balanced approach to meeting water supply and environmental needs. The Water Authority works through its member agencies to provide a safe, reliable water supply to 3 million people in the San Diego region. As the Metropolitan Water District's largest member agency, we receive a significant portion of our water from the Delta via the State Water Project (SWP). We have been involved for more than 15 years with efforts to restore the Delta as a reliable supply of high-quality water and a healthy ecosystem. We support the work of the CALFED Bay-Delta Program to accomplish these vital goals.

SDCWA-1

We support the SDIP and believe it is the right thing to do environmentally and for the state's water supply. Major benefits of the SDIP include:

- Protecting fisheries by installing a permanent operable gate that reduces the movement of juvenile salmon toward the state and federal export pumps.
- Maintaining adequate water levels and quality for agricultural diverters in the south Delta by installing three permanent operable flow control gates and dredging south Delta channels.
- Making the Bay-Delta system more flexible, increasing the quantity and reliability of average deliveries to contractors, and enabling the Department of Water Resources (DWR) to deliver additional water to its customers when the water is available and fishery protection agencies deem it safe to do so. DWR also will have the ability to shift the timing of pumping when necessary to avoid harming fish or the ecosystem.

Mr. Lester A. Snow

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January 23, 2006

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00066

Moreover, the SDIP requires no major new facilities, but rather relies on existing capacity in the state's Banks Pumping Plant. Most of the funding for the project already has been secured through voter-approved bond measures. Both of these considerations are especially important in this era of tight budgets and infrastructure challenges.

SDCWA-1

The Water Authority supports the two-stage approach outlined in the SDIP's draft environmental impact report/environmental impact statement (EIR/EIS). The first stage concerns physical and structural improvements and the second addresses the proposed operational improvements. We recognize this division as a prudent approach in that it will allow scientists to complete their investigation into the causes of falling pelagic fish populations and integrate that data into the decision-making process.

We support the identified Stage 1 preferred alternative, which calls for replacing temporary rock barriers in the South Delta with four permanent operable gates and dredging several South Delta channels. We are encouraged that DWR and the Bureau of Reclamation plan to issue a supplement to the final EIR/EIS rather than doing a lengthy, expensive separate environmental review for Stage 2.

As a regional water agency that relies heavily but not exclusively on imported water supplies, the Water Authority looks forward to working with DWR and all interests to improve the Delta as a water supply and an ecosystem. The SDIP is an important element of this effort; it is, in fact, a foundational element of the Delta Improvements Package. Delta water, delivered by the SWP, is an essential element of the diversified water supply that the Water Authority and its member agencies have developed to meet the San Diego region's needs, now and in the future. A healthy and reliable Delta system is essential to San Diego County's 3 million residents and its \$150 billion economy.

Sincerely,

Maureen A. Stapleton
General Manager

Also sent electronically to sdip_comments@water.ca.gov

Responses to Comments

SDCWA-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter SGPWA



San Geronio Pass Water Agency

A California State Water Project Contractor
1210 Beaumont Avenue • Beaumont, CA 92223
Phone (951) 845-2577 • Fax (951) 845-0281

SGPWA

DEC 22 2005 00025

December 13, 2005

President:
John Jeter

Mr. Lester Snow
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Vice President:
Ray Morris

Treasurer:
Jim Andersen

Dear Director Snow:

Directors:
Richard Larsen
Chris Mann
Jim Snyder
Barbara Voigt

On behalf of the San Geronio Pass Water Agency (Pass Agency), I am writing to express my agency's support for the Department of Water Resources' (DWR) South Delta Improvements Program (SDIP). The SDIP is a critical water supply, water quality, and environmental project designed to meet California's diverse water needs. Recently, DWR and the U.S. Bureau of Reclamation released a draft Environmental Impact Report/Statement (EIR/S), beginning an important 90-day public review and comment process.

General Manager
& Chief Engineer
Jeff Davis, PE

Legal Counsel:
McCormick, Kidman
& Behrens

The Pass Agency is one of 29 State Water Contractors, most of whom depend on the Delta for our water supply. Located in one of the fastest growing parts of the State, our local retailers are experiencing large annual increases in water demands. These retailers depend on the Pass Agency to help meet their growing demands. Without access to the Delta, local agencies would have to mine local groundwater basins to meet these demands.

California is facing a critical challenge--we need a safe, reliable and high quality water supply to keep up with our rising population and economy. However, we have limited water supplies, so we must better utilize our existing water resources and infrastructure; otherwise, we put our communities, farms, environment and businesses at risk. Two-thirds of California receives its water from the San Francisco Bay/Sacramento-San Joaquin Delta. Given its importance, we need better ways to manage the Delta's water delivery system.

In 2000, the state and federal governments initiated the historic CalFed Bay-Delta Program to manage the Bay-Delta's water resources and ecosystem. A unique collaboration of interests supported the plan, including environmental organizations, water agencies, business interests, farmers, and state and federal resource agencies. SDIP is the next step forward in this long-term planning effort for the Bay-Delta.

SGPWA-1

Importing Water To The Pass Area

DEC 22 2005 00025

Mr. Lester Snow
Page two

SDIP is a responsible and balanced plan to better utilize and integrate our existing water management infrastructure in the Delta. Collectively, it will improve our state's water supply reliability, water quality and the overall health of the Bay-Delta ecosystem. The program will construct seasonal tidal gates to protect fish, and improve water circulation and quality in the Delta, dredge select Delta channels to improve water deliveries for local farmers, and allow State Water Project deliveries to increase modestly – when needed and environmentally safe to do so.

SGPWA-1

Currently, the state is limited in its ability to use surplus water supplies. We have the infrastructure, but until SDIP is approved, water managers cannot fully use the existing system. SDIP calls for only a 3-5% increase in the average amount of water pumped from the Delta. More significantly, SDIP will provide flexibility to shift the timing of water deliveries when surplus is available and when environmentally safe to do so. SDIP is an ideal option – it will not require the construction of major new infrastructure. And, funding for the program has already been secured through passage of voter approved bonds in 2000.

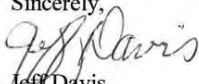
Importantly, SDIP will help protect important Delta environmental resources. Specifically, it will help protect fish species in the Delta channels. At the same time, by providing the state greater flexibility in how and when SDIP operates its system of pumps, fish are granted greater protections.

Given all these points, SDIP is supported by a statewide coalition of water, agriculture, business, planning organizations, and local government officials including the Association of California Water Agencies, State Water Contractors, California Chamber of Commerce, California Business Properties Association and the Western Growers Association.

Water is the lifeblood of California. It is our responsibility to use this resource wisely through best management practices, including water conservation, recycling and storage, to ensure California's water future. It is imperative that we have a more flexible water system so that we can continue to accommodate growth while relying on existing water supplies.

Again, we strongly support SDIP and encourage all key stakeholders to help advance this critically needed project.

Sincerely,



Jeff Davis
General Manager

DEC 22 2005 00025


cc (*by facsimile*): Hon. Governor Arnold Schwarzenegger, (916) 445-4633
Mr. Ryan Brodderick, Director, California Department of Fish and Game,
(916) 653-7387
Mr. Mike Chrisman, Secretary, California Resources Agency, (916) 653-
8102
Mr. Joe Grindstaff, Director, California Bay-Delta Authority, (916) 445-
7297
Mr. Kirk Rodgers, Regional Director, Mid-Pacific Region, U.S. Bureau of
Reclamation, (916) 978-5114
Mr. Fred Aguiar, Cabinet Secretary, Office of the Governor, (916) 324-6358

Responses to Comments

SGPWA-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter SLDMWA

02-07-2006 05:13PM FROM-SLDMWA	+2098278040	T-897 P.002 F-303
		SLDMWA
February 7, 2006	FEB 07 2006	0049
Mr. Lester Snow Director Department of Water Resources P.O. Box 942836 Sacramento, CA 94236-0001	Mr. Kirk Rogers Regional Director U.S. Bureau of Reclamation 2800 Cottage Way, MP-100 Sacramento, CA 95825-1898	
RE: South Delta Improvements Program Draft Environmental Impact Statement/Environmental Impact Report		
Dear Director Snow and Regional Director Rogers:		
On behalf of the San Luis & Delta-Mendota Water Authority's member agencies, I write to express our organization's support for the South Delta Improvements Program (SDIP), a critical water supply, water quality, and environmental project designed to improve California's ability to meet its diverse water needs. In October, DWR and USBR released a draft Environmental Impact Statement/Environmental Impact Report (EIS/R) for the SDIP, continuing an important public process. This letter is our response to the call for comments regarding the draft environmental documentation.		842 SIXTH STREET SLDMWA-1 SUITE 7
The San Luis & Delta-Mendota Water Authority consists of 32 water agencies ¹ providing service for agricultural, urban, and wildlife management purposes in the western San Joaquin Valley, San Benito and Santa Clara counties. The Authority's members deliver water to more than 1.3 million acres of the nation's most productive farm lands, 1.7 million California residents, and over 150,000 acres of some of the State's most important wildlife refuges in the Pacific Flyway.		P.O. BOX 2157 LOS BANOS
As stewards of this essential resource, our members are well aware of the mounting water supply challenges California is facing. We need an increasingly safe, reliable and high quality water supply to keep pace with our rapidly rising population and expanding trillion-dollar economy, while preserving our deeply valued agricultural and ecological		CALIFORNIA 93635
¹ Santa-Carbonsa Irrigation District, Broadview Water District, Byron Bethany Irrigation District (CVP), Central California Irrigation District, Centinella Water District, City of Tracy, Columbia Canal Company, Del Puerto Water District, Eagle Field Water District, Firebaugh Canal Water District, Fresno Slough Water District, Grasslands Water District, James Irrigation District, Laguna Water District, Merced Springs Water District, Oro Loma Water District, Pacheco Water District, Pajero Valley Water Management Agency, Panoche Irrigation District, Patterson Irrigation District, Pleasant Valley Water District, Reclamation District 1606, San Benito County Water District, San Luis Canal Company, San Luis Water District, Santa Clara County Water District, Tranquillity Irrigation District, Turner Island Water District, West Side Irrigation District, West Stanislaus Irrigation District, Westlands Water District, Widren Water District.		(209) 826-9696 OFFICE (209) 826-9698 FAX

05:13PM FROM-SLDMA

FEB 07 2006

00149

eritage. This need is complicated by the geographic location of the limited water supplies in our arid state, so we must best utilize our existing water resources and infrastructure; otherwise, we put our communities, farms, environment, and businesses at undue risk. Two-thirds of California receives its water from the San Francisco Bay/Sacramento-San Joaquin Delta. Given its importance, we need to implement improvements to the Bay-Delta's water delivery system to maximize the benefit of the water for human and environmental uses. In short, we need to make every drop count.

In 2000, the state and federal governments initiated the historic CALFED Bay-Delta Program (Program) to address the Bay-Delta's water resources and ecosystem management in a comprehensive, collaborative, and balanced manner. A unique association of interests supported the Program including environmental organizations, water agencies, business interests, farmers, and state and federal water and fish agencies. To date, the Program has invested hundreds of millions of dollars in environmental efforts to enhance the Bay-Delta and SDIP is but the next step forward in this long-term effort. Furthermore, given its position within the Program, the full implementation of SDIP will assist in maintaining the Program's overall balance and help ensure future funding commitments from federal, state, and local interests alike.

In isolation, the SDIP through implementation of Stage 1 provides increased water supply reliability to local interests, enhances water quality in the South Delta region, and improves the safety of migration for many anadromous fish species of concern on the San Joaquin River. The Stage 2 facet not only provides opportunity to enhance the water supply and water supply reliability for human needs but also for environmental purposes, including South-of-Delta refuges deeply reliant upon water exported from the Bay-Delta to support essential areas of the Pacific Flyway. Aside from these direct benefits, the increased operational capacity promised by SDIP provides indirect benefit to other Bay-Delta management efforts, including the pelagic species, by allowing the project and management agencies greater operational flexibility. In and of itself, SDIP is a responsible and balanced plan to better utilize and integrate our existing water management infrastructure in the Bay-Delta. Collectively, it will improve our State's water supply and reliability, water quality, and the overall health of the Bay-Delta and San Joaquin River ecosystems.

SLDMWA-1 cont'd

The draft EIS/R is a comprehensive and complex document. In its attempt to explain the myriad of operational alternatives and affecting circumstances we occasionally find areas that could benefit from greater clarity and commitment. This is particularly true with respect to the relationship between the Environmental Water Account (EWA) and SDIP, and the Stage 2 decision.

The EWA was established to provide the fish agencies another tool to supply an additional level of protection for at-risk native fish species beyond the significant resources previously dedicated for this purpose by the CVP and SWP. The initial program had an anticipated duration of four years. A determination of a future EWA, if any, would then be informed by a comprehensive scientific review of the four year experiment. In 2004, the EWA was extended through 2007 to coincide with the end of the CALFED Stage 1 and with it the commitment to undertake a comprehensive scientific review of the program's efficacy was delayed.

SLDMWA-2

San Luis & Delta-Mendota Water Authority
Comments on the South Delta Improvements Program
Draft Environmental Impact Statement/Environmental Impact Report

Page 2 of

05:14PM FROM-SLDMWA

FEB 07 2006 00149

The importance of the EWA comprehensive scientific review to guide the program's future scale and scope cannot be understated and yet the draft EIS/R touches this point only lightly. In fact, Section 6.1 states, "SDIP alternatives may allow increased pumping during periods when EWA actions to reduce entrainment would be taken under the baseline. Additional EWA assets, therefore, would be required to provide the same level of fish protection and water deliveries." What level of fish protection has actually been identified? How many fish have been saved? What kinds of fish? The answers to these questions remains elusive and the growing doubt regarding the efficacy of the EWA to protect fish, particularly pelagic species, is in sharp contrast to the stated assumption that the EWA must grow in simple concurrence with expanded diversion potential. The draft EIS/R would be better served by acknowledging that the overall benefit of the EWA, or some equivalent, remains in question and that the future size and purpose of the EWA will be dependent upon the findings of the long anticipated comprehensive scientific review.

SLDMWA-2 cont'd

The EWA treatment is also murky with respect to its relationship to the Stage 2 decision. The EWA program is not mitigation for the increased operational capacity that may be realized under Stage 2 and the Draft EIS/R aptly states that appropriate mitigation measures will be developed along with a Stage 2 preferred alternative. Yet, the draft also assumes that a larger EWA will be employed irrespective of any findings through the comprehensive scientific review process that may be contrary to such an action and in fact the draft goes so far as to state, "These mitigation measures [export curtailments, asset crediting] are designed to provide the identical level of EWA protections with the increased SWP Banks pumping (i.e., CCF diversion) limit. All of these SDIP mitigation measures would be incorporated into the expanded long-term EWA program, once it is adopted." [emphasis added]. The concern with this statement, and other similar inferences, is that it suggests the EWA, or some increment, mitigates for an expanded diversion potential and pre-supposes conclusions from both the comprehensive scientific review and supplemental environmental analyses that will occur prior to the determination of a Stage 2 preferred alternative. The draft EIS/R would be better served by simply stating that the mitigation of Stage 2 will be developed along with a Stage 2 preferred alternative and that such measures will be informed and fully representative of the scientific research examining the Bay-Delta's health and the effect of project operations.

Regarding the Stage 2 decision, the lack of a firm temporal decision point is disquieting. While we accept the decision to bifurcate the SDIP's decision process into two stages, and acknowledge that the draft EIS/R contemplates in sweeping generalities a Stage 2 decision timeline, we believe the lack of commitment to firm decision points is unnecessary and counterproductive. The benefit in dividing the SDIP decision process into two components is premised upon three assumptions: 1) that project operations have a significant affect on the status of pelagic species, 2) that further intense study will provide timely insight on the factors affecting the Bay-Delta's health, and 3) that increasing permitted diversion capacity would result in greater harm to the Bay-Delta. In our view, these assumptions lack merit.

Data pertaining to the Bay-Delta and project operations has been collected for decades and no firm correlation between project operations and the status of the pelagic species has ever been

SLDMWA-3

San Luis & Delta-Mendota Water Authority
Comments on the South Delta Improvements Program
Draft Environmental Impact Statement/Environmental Impact Report

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02-07-2006 05:14PM FROM-SLDWMA

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FEB 07 2006

identified. In fact recently, some study on the subject has shown no statistically significant correlation between salvage and subsequent delta smelt abundance indices². While a more comprehensive analysis of export effects on subsequent delta smelt abundance conducted by Dr. Bryan Manly for the Pelagic Organism Decline program concludes that such effects exist, and can produce both positive and negative effects, these influences are not important relative to changes in delta smelt abundance.³ Anecdotal "evidence" abounds; however, in order to find a durable solution to the Bay-Delta health question we must be willing to follow the science, even at the risk of offending the conventional wisdom.

SLDWMA-3 cont'd

We strongly support the investment into understanding the cause(s) of this most recent decline in the health of the Bay-Delta, as exemplified by the diminishing population indices of the reliant pelagic species. However, our enthusiasm for the investment is tempered by our cautious optimism regarding its scope. For decades now, the thrust of effort to improve the Bay-Delta's condition has been unproductively narrow, if not outright distracting, and so we remain concerned that the emphasis of many will be to do more of the failed same, focus solely on project operations. Modern data strongly points to a limited effect, if any, from exports and far more convincingly suggest the true culprits to be invasive species and/or toxics from regional urban and agricultural discharges. Our optimism in the research effort is buoyed by those few willing to apply new thinking against the old paradigm in order to understand the cause of this most recent, if not cyclical, occurrence. We are, however, doubtful of a solution being presented in the timeframe generally suggested by the draft EIS/R and therefore remain concerned as to the unstated "next step" if such an understanding is not present at the completion of the Stage 1 decision process. For these reasons, and as a matter of accountability to SDIP proponents, the California electorate who chose to support funding for this project through the passage of Proposition 13 nearly six years ago, and other interested parties, we believe that firm decision points and contingency actions should be articulated in the draft EIS/R.

Lastly, and to the third bifurcation assumption, increasing the permitted diversion capacity at Clifton Court Forebay in and of itself will play no role in degrading or improving the Bay-Delta health. There are and will remain a plethora of overriding conditions that govern operations in a manner intended to produce the most beneficial outcome, primarily for the Bay-Delta ecosystem. Standards such as the export/inflow ratio and X2, and biologically based operational decisions such as storage releases or focused export curtailments, are in place whether the permitted diversion rate is 1 or 10,000 cubic-feet per second. It is incumbent upon us to operate responsibly and full implementation of SDIP will only enhance our potential to fulfill this obligation.

In conclusion, the state is currently constrained in its ability to utilize surplus water supplies. We have the infrastructure to move the water, but until SDIP is approved, the state's water managers

SLDMWA-1 cont'd

² Attachment 1: The State of the Delta; What is Killing the Delta Smelt? Dr. BJ Miller, January 2006.

³ Dr. Bryan Manly, personal communication to Dr. BJ Miller, January 25, 2006. "... although there are significant effects of hydrological and export variables on delta smelt, these seem non-linear [positive and negative], and do not seem to be able to explain the main long-term trends in delta smelt numbers. By that I mean that the hydrology and export effects seem to produce small wiggles on the trend lines. This is not saying that the effects are not statistically significant. It is saying that the effects don't seem to be important compared to other things going on."

02-07-2006 05:14PM FROM-SLDMWA

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T-887 P.006/016 F-383

FEB 07 2006

cannot fully or responsibly use the existing system. SDIP predicts only a nominal 3-5% increase in the average amount of water pumped from the Delta. More significantly, SDIP will provide the agencies precious flexibility to shift the timing of water deliveries to periods of less environmental sensitivity when necessary. SDIP is a good project for California – it does not require building major new infrastructure, it maximizes the value of under utilized assets, and provides a multitude of important environmental benefits, all with funding already secured through passage of voter approved bonds in 2000 (Proposition 13).


SLDMWA-1 cont'd

Given all these points it is no wonder why SDIP is also supported by a broad, statewide coalition of water, agricultural, business, planning organizations, and local government officials including the Association of California Water Agencies, State Water Contractors, California Chamber of Commerce, California Business Properties Association, and the Western Growers Association.

Water is the lifeblood of California – critical to our families, communities, and quality of life. It is our responsibility to use this precious resource wisely through all possible best management practices, including water conservation, recycling and storage to ensure California's future. To successfully do so, it is imperative that we have a more flexible water delivery system to maximize the benefit of existing though limited water supplies.

Again, we strongly support the SDIP and encourage all key stakeholders to help advance this critically needed project.

Sincerely,



Daniel G. Nelson
Executive Director

CC:

San Luis & Delta-Mendota Water Authority Board of Directors
San Luis & Delta-Mendota Water Authority Member Agencies
Terry Erlewine, General Manager, State Water Contractors
Steve Hall, Executive Director, Association of California Water Agencies

San Luis & Delta-Mendota Water Authority
Comments on the South Delta Improvements Program
Draft Environmental Impact Statement/Environmental Impact Report

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Responses to Comments

SLDMWA-1

The commenter's description of the project's benefits and support for the project are noted.


SLDMWA-2

Please see Master Response E, *Reliance on Expanded Environmental Water Account Actions for Fish Entrainment Reduction*, for mitigation of entrainment under Stage 2.

SLDMWA-3

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Comment Letter SCVWD

	SCVWD 3755 ALMADEN EXPWY SAN JOSE, CA 95118-3686 TELEPHONE (408) 265-2600 FACIMILE (408) 266-0271 www.valleywater.org AN EQUAL OPPORTUNITY EMPLOYER
<p>February 7, 2006</p>	
<p>RE: South Delta Improvements Program</p>	
<p>Mr. Lester Snow Director Department of Water Resources P.O. Box 942836 Sacramento, CA 94236-0001</p>	<p>FEB 27 2006 000220</p>
<p>Dear Mr. Snow:</p>	
<p>The Santa Clara Valley Water District (District) has reviewed the South Delta Improvements Program (SDIP) Draft Environmental Impact Report/Statement (Draft EIR/EIS) and has the following comments, in addition to those provided through the State Water Contractors which are hereby incorporated.</p>	
<p>The District provides wholesale water supply and watershed management to 1.7 million residents of Santa Clara County and to the vital high-tech economy known as "Silicon Valley." On average, half of the County's water supply must be imported from the Bay-Delta watershed through the State Water Project and Central Valley Project. The District's Integrated Water Management Plan includes substantial local investments in water use efficiency, recycled water, and groundwater management. However, ensuring the reliability of the county's water supply also depends on protecting and restoring the reliability of water imported from the Bay-Delta watershed.</p>	<p>SCVWD-1</p>
<p>The SDIP is a key component of broader State and federal actions described in the CALFED Record of Decision to improve the Bay-Delta ecosystem, water quality and water supply. Analyses in the Draft EIR/EIS indicate that SDIP will protect migrating salmon, maintain water levels for South Delta agricultural water users, and improve water circulation and quality in the South Delta through the installation of permanent operable tidal gates in Stage 1.</p>	
<p>One area that District staff has reviewed in particular is the modeling of potential water quality impacts in Clifton Court Forebay, since South Bay Aqueduct deliveries are directly affected by water quality in this area. Based on monthly averaged data the Draft EIR/EIS shows a slight degradation in salinity, more related to Stage 2 than Stage 1. We appreciate the two-stage decision-making process presented in the Draft EIR/EIS, and the commitment to additional environmental review prior to Stage 2, so that modeling tools and studies can be refined to better understand any potential water quality impacts.</p>	
<p>Overall, we believe that the SDIP will provide important operational flexibility for both the Delta environment and water users, and support continued progress in coordination with a long-term vision for a sustainable Delta.</p>	
<p>The mission of the Santa Clara Valley Water District is a healthy, safe and enhanced quality of living in Santa Clara County through watershed stewardship and comprehensive management of water resources in a practical, cost-effective and environmentally sensitive manner.</p>	

Mr. Lester Snow
Page Two
February 7, 2006

FEB 27 2006 000220

We appreciate the helpfulness of Department of Water Resources staff in our review of the Draft EIR/EIS. If you have any questions, please contact me at 408 265 2600, extension 2073.

Sincerely,



Joan Maher
Imported Water Unit Manager

Responses to Comments

SCVWD-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter TCWD

TEJON-CASTAC WATER DISTRICT

4436 Lebec Road
Lebec, CA 93243

TCWD

DEC 22 2005

Telephone: (661) 248-3000
Facsimile: (661) 248-3100

Mailing Address
P.O. Box 1000
Lebec, CA 93243

December 9, 2005

Mr. Lester Snow, Director
California Department of Water Resources
1416 9th Street
Sacramento, CA 95814-5515

RE: Support for South Delta Improvements Program

Dear Director Snow,


The Tejon-Castac Water District supports the Department of Water Resources' South Delta Improvements Program (SDIP), because it is a responsible and balanced plan that will allow California to better utilize and integrate its existing water management infrastructure in the San Francisco Bay/Sacramento-San Joaquin Delta, while also protecting the environment. We urge you and key stakeholders to advance this critically needed program in a timely fashion, to enhance the state's water future.

As a local water district in the Southern San Joaquin Valley, Tejon-Castac is concerned about the long-term viability of the Delta ecosystem and its ability to deliver water to Central Valley and Southern California users. We believe the state must continue to pursue the projects and programs outlined in the CalFed Bay-Delta Program if it is to succeed in protecting and enhancing the Delta while ensuring a reliable long-term water supply. The SDIP is a critical component of the CalFed process that must be implemented.

The SDIP will construct seasonal tidal gates to protect fish and improve water circulation and quality in the Delta. It will dredge select Delta channels to improve water deliveries for local farmers, and it will provide the flexibility to shift the timing of State Water Project deliveries when surplus water is available and when it is environmentally safe to do so.

Again, we support the SDIP and encourage your department and all other stakeholders to advance and implement it as soon as possible.

Sincerely,


DENNIS MULLINS
President

cc: The Honorable Arnold Schwarzenegger, Governor
Mr. Mike Chrisman, Secretary, California Resources Agency
Mr. Joe Grindstaff, Director, California Bay-Delta Authority
Mr. Ryan Broddrick, Director, California Department of Fish and Game

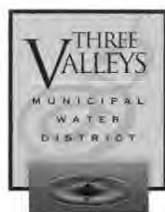
TCWD-1

Responses to Comments

TCWD-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter TVMWD



TVMWD
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*2 H. Keller
Marshall*

January 19, 2006

FEB 27 2006 000221

Mr. Lester Snow, Director
Department of Water Resources
South Delta Improvements Program
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Support of the South Delta Improvements Program

Dear Director Snow:

On behalf of Three Valleys Municipal Water District, I am writing today to express our organization's support for the Department of Water Resources' (DWR) South Delta Improvements Program (SDIP). We do believe that this is a critical project designed to meet California's diverse water needs. This October, DWR and the U.S. Bureau of Reclamation released a draft Environmental Impact Report/Statement (EIR/S) for SDIP, starting an important public review and comment process.

Three Valleys Municipal Water District strongly supports projects that improve water reliability, long-term planning and natural resource protection. As a water supplier for approximately 600,000 people in the eastern Los Angeles County, we fully understand the need for projects such as these that will help meet the state's ever-growing demand for this limited resource.

California faces a critical challenge – we need safe, reliable and high quality water to keep up with the rapidly rising population and fast-growing economy. However, we have limited water supplies in our arid state, so we must better utilize our existing water resources and infrastructure; otherwise, we put our communities, farms, environment and businesses at risk. Two-thirds of California receives its water from the San Francisco Bay/Sacramento San Joaquin Delta. Given its importance to the state, we need better ways to manage the Delta's water delivery system, as well as the water itself. In essence, we need to make every drop count, not just for now but for the future as well.

In 2000, the state and federal governments initiated the historic CalFed Bay-Delta Program to manage the Bay-Delta's water resources and eco-system. A unique collaboration of interests supported the plan including environmental organizations, water

TVMWD-1

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*Mr. Lester Snow
Support of the SDIP
01/19/06
Page 2*

FEB 27 2006 000221

agencies, business interests, farmers, and state and federal water and fish agencies. SDIP is the next step forward in this long-term planning effort for the Bay-Delta.

SDIP is a responsible and balanced plan to better utilize and integrate our existing water management infrastructure in the Delta. Collectively, it will improve our state's water reliability, quality and the overall health of the Bay-Delta ecosystem. As described, the program will construct seasonal tidal gates to protect fish, improve water circulation and quality in the Delta, dredge select Delta channels to improve water deliveries for local farmers, and allow State Water Project deliveries to increase modestly – only when needed and environmentally safe to do so.

TVMWD-1

Currently, the state is constrained in its ability to use surplus water supplies. We have the infrastructure to move the water, but until SDIP is approved, the state's water managers cannot fully use the existing system. SDIP calls for only a 3 to 5% increase in the average amount of water pumped from the Delta. More significantly, SDIP will provide the flexibility to shift the timing of water deliveries when surplus is available, and when environmentally safe to do so. SDIP will not require building a new project or the construction of major new infrastructure. Funding for the program has already been secured through passage of the voter approved bonds in 2000 (Proposition 13).

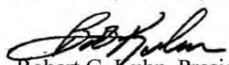
Importantly, SDIP will help protect important Delta environmental resources. Specifically, it will help protect fish species in the Delta channels. At the same time, by providing the state greater flexibility in how and when SDIP operates its system of pumps, fish are granted greater protections.

Given all these points, SDIP is supported by a statewide, broad coalition of water, agriculture, business, public policy and planning organizations including the Association of California Water Agencies, State Water Contractors, California Chamber of Commerce, California Business Properties Association and the Western Growers Association.

Water is the lifeblood of California – critical to our families, farms, and businesses. It is our responsibility to use this precious resource wisely through all possible best management practices to ensure California's healthy water future. Flexibility in our water delivery system will continue to accommodate growth in our population and economy while relying on the existing water supplies.

Again, we strongly support SDIP and encourage its further development progress. We hope that all key stakeholders will help to advance this critically-needed project.

Thank you,
Three Valleys Municipal Water District


Robert G. Kuhn, President
Board of Directors


Responses to Comments

TVMWD-1

The commenter's description of the project's benefits and support for the project are noted.

Comment Letter TLBWSD

TLBWSD



TULARE LAKE BASIN WATER STORAGE DISTRICT

ESTABLISHED 1926

1001 CHASE AVENUE, CORCORAN, CALIFORNIA 93212
PHONE (559) 992-4127 • FAX (559) 992-3891

January 9, 2006

Lester Snow
Director
Department of Water Resources
P. O. Box 942836
Sacramento, CA 94236-0001

JAN 12 2006 050

Re: Support of South Delta Improvements Program

COPY

Dear Mr. Snow:

By this letter, the Tulare Lake Basin Water Storage District is providing our support for DWR's South Delta Improvements Program (SDIP). In October 2005, DWR and the Bureau released a draft EIR/EIS for public review and comment. This Program will provide water supply, water quality and environmental benefits critical to California's growing water requirements.

The Tulare Lake Basin Water Storage District has a responsibility to our landowners to protect and enhance the water rights of the District in order to provide reliable irrigation water to lands within the District. This program is one of several programs that can meet that responsibility.

We would encourage all key stakeholders to help advance this much needed project.

Yours truly,

Brent L. Graham
General Manager

TLBWSD-1

Copies to:

- Governor Arnold Schwarzenegger
- Secretary Mike Chrisman, Resources Agency
- Director Joe Grindstaff, California Bay-Delta Authority
- Regional Director Kirk Rodgers, Mid-Pacific Region, Bureau of Reclamation
- Deputy Cabinet Secretary Dan Skopee, Office of the Governor
- Cabinet Secretary Terry Tamminen, Office of the Governor

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Jan 12 2006 2:23PM

Red Gate Communications

818 784 1220

P. 12

Responses to Comments

TLBWSD-1

The commenter's description of the project's benefits and support for the project are noted.